

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b>
<b>JERRY LEE WOMACK, JR.</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud – 3 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 1028A(a)(1) (aggravated identity theft – 2 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information

1. First National Bank of Pennsylvania (“FNB”) was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 7876.

2. JPay Inc. (“JPay”) was a privately held corrections-related service provider based in the United States with its headquarters in Miramar, Florida, that contracted with state departments of correction, county jails, and federal prisons to provide technologies and services, including money transfers. Persons could establish accounts with JPay and fund those accounts in a variety of ways, including using a credit card and making withdrawals from a bank account using an automated teller machine (“ATM”) debit card. JPay account holders who were not incarcerated could transfer funds from their JPay account to inmates.

3. “Snapchat” was a multimedia messaging application developed and

currently owned by Snap Inc., headquartered in Venice, California, that allowed users to post pictures and messages that were only available a short time and hence could be viewed by other Snapchat users for only a short period of time before they became inaccessible.

4. “Instagram” was a social networking service that allowed users to share photographs, videos, and messages with other users. Instagram users typically accessed the service through an application on their mobile devices.

5. Square, Inc. was a financial services, merchant services aggregator, and mobile payment company based in San Francisco, California. Square, Inc. marketed several software and hardware payments products, including the Square Cash App, a person-to-person payments service that allowed users to download the Square Cash App application on their mobile device and use the Square Cash App to send money using their ATM debit card number to other persons, simply by entering the recipient’s mobile phone number or “\$Cashtag” (a unique user name that persons could establish upon setting up a Square Cash account).

6. From in or about June 2017, through in or about December 2017, in the Eastern District of Pennsylvania and elsewhere, defendant

**JERRY LEE WOMACK, JR.**

alone and with co-schemers known and unknown, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud FNB and to obtain monies owned by and under the care, custody, and control of FNB by means of false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

7. Defendant JERRY LEE WOMACK, JR., along with co-schemers Steven Ronald Randall, Nasir Joseph Outlaw, and Shyann Carrero, each charged separately, and other

co-schemers, solicited co-schemers (referred to herein as “Account Holders”), including co-schemers Jair Peralta, Xavanna Olivera, Daquan Nock, Ahsheem Nock, Jaylen Jefferson, Linda Pacheco, Zachery Thomas, George Anthony Martinez, Elijah Marell Williams, Anabell Dealba, and Jarrod Thomas, each charged separately, and B.B., L.W., M.W., and B.H., who was then a minor, to open bank accounts, obtain ATM debit cards, and provide their ATM debit cards and personal identification numbers (“PINs”) so that defendant WOMACK, co-schemer Randall, and other co-schemers could deposit and cause to be deposited fraudulent checks into the accounts and then have the cash withdrawn before the bank discovered that the checks were fraudulent, in return for a share of the proceeds.

8. Co-schemer Nasir Joseph Outlaw recruited defendant JERRY LEE WOMACK, JR. into the scheme and introduced defendant WOMACK to co-schemer Steven Ronald Randall.

9. Defendant JERRY LEE WOMACK, JR. personally recruited and helped to recruit several co-schemers to serve as Account Holders, including among others co-schemers Daquan Nock, Ahsheem Nock, Jaylen Jefferson, Zachery Thomas, Anabell Dealba, Jarrod Thomas, Elijah Marell Williams, and B.H., who was then a minor. Defendant WOMACK also recruited co-schemer Zaire Chesney, charged separately, who himself became a recruiter and in turn recruited co-schemer P.S. into the scheme.

10. Defendant JERRY LEE WOMACK, JR. personally used Account Holders’ ATM debit cards and PINs to deposit fraudulent checks into and make cash withdrawals from the Account Holders’ accounts. Defendant WOMACK also supervised other co-schemers to whom he provided Account Holders’ ATM debit cards and PINs and instructed them to make deposits into and withdrawals from the Account Holders’ accounts.

11. Defendant JERRY LEE WOMACK, JR., co-schemers Steven Ronald Randall, Dawson Thomas, Shyanne Carrero, Naseer Joseph Outlaw, and Daquan Nock convinced some of the Account Holders, to themselves recruit and attempt to recruit other co-schemers to serve as Account Holders.

12. Defendant JERRY LEE WOMACK, JR., co-schemers Steven Ronald Randall and Nasir Joseph Outlaw, and other co-schemers, obtained checks and checkbooks from inactive or closed accounts at banks and other financial institutions that they knew were closed or otherwise invalid accounts.

13. Defendant JERRY LEE WOMACK, JR., co-schemers Steven Ronald Randall, and other co-schemers wrote checks they had obtained from the inactive or closed bank and other financial institution accounts made payable in various dollar amounts to the Account Holders.

14. Defendant JERRY LEE WOMACK, JR. and other co-schemers communicated with one another through the use of cellular telephone calls, text messages, instant messaging applications, including Snapchat, and social media posts to facilitate the scheme, including the recruitment of the Account Holders, the transfer of ATM debit cards, PINs, and fraudulent checks, and the collection and payment of fraud proceeds.

15. Co-schemer Steven Ronald Randall established a JPay account in the name of "Steve Ranz" ending in 6044 that he accessed and controlled.

16. Co-schemer Steven Ronald Randall used the ATM debit cards and PINs he obtained from the co-schemers to make cash deposits from the co-schemers' checking accounts into his JPay account in the name of "Steve Ranz" before the banks discovered that the checks deposited into the co-schemers' checking accounts were fraudulent.

17. Co-schemer Steven Ronald Randall transferred funds from his JPay account in the name of "Steve Ranz" to inmates incarcerated throughout Pennsylvania.

**FNB ACCOUNT OF DAQUAN NOCK**

**(Intended Loss of \$6,382; Actual Loss of \$1,159.40)**

18. On or before July 18, 2017, at the request of defendant JERRY LEE WOMACK, JR., co-schemer Daquan Nock agreed to allow his existing FNB account ending in 6597 to be used to deposit fraudulent checks and to withdraw cash before FNB discovered that the checks were fraudulent, in return for a share of the proceeds.

19. On or about July 18, 2017, at an ATM at the FNB branch in Muhlenberg Township, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Daquan Nock deposited a fraudulent check in the amount of approximately \$2,125 into his existing FNB account ending in 6597 -- check number 097, drawn on the closed Wachovia Bank account of M.S. ending in 7209, and made payable to Daquan Nock. At the time of this deposit, Daquan Nock's FNB account ending in 6597 had a negative balance of approximately (\$171.45).

20. On multiple occasions between on or about July 18, 2017, and on or about July 19, 2017, defendant JERRRY LEE WOMACK JR. and co-schemer Steven Ronald Randall, and co-schemers working under their direction, used and aided and abetted the use of the ATM debit card and PIN number associated with the FNB account of co-schemer Daquan Nock ending in 6597 to collectively withdraw approximately \$920 from that account.

21. On or about July 19, 2017, at an ATM at the FNB branch in Muhlenberg Township, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Ahsheem Nock attempted without success to deposit a fraudulent check in the

amount of approximately \$2,260 into Daquan Nock's existing FNB account ending in 6597.

22. On or about August 8, 2017, a co-schemer caused the mobile deposit of a fraudulent check in the amount of approximately \$1,997 into co-schemer Daquan Nock's FNB account ending in 6597 -- check number 629, drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938, and made payable to Daquan Nock.

**FNB ACCOUNT OF JAIR PERALTA**

**(Intended Loss of \$7,980; Actual Loss of \$7,667.65)**

23. On or before August 10, 2017, at the request of co-schemers Nasir Joseph Outlaw and Dawson Thomas, co-schemer Jair Peralta agreed to open an FNB account and obtain an ATM debit card associated with the account in order to deposit fraudulent checks and withdraw cash before FNB discovered that the checks were fraudulent in return for the promise of a portion of the proceeds successfully obtained from FNB.

24. On or about August 10, 2017, at an FNB branch in Cumru Township, Berks County, Pennsylvania, at the direction of co-schemer Nasir Joseph Outlaw and co-schemer Dawson Thomas, co-schemer Jair Peralta opened an FNB account ending in 9582 with a \$20 cash deposit and obtained an ATM debit card associated with the account.

25. On or before August 23, 2017, co-schemer Jair Peralta gave his ATM debit card and PIN number tied to his FNB account ending in 9582 to co-schemer Steven Ronald Randall.

26. On or about August 23, 2017, at an ATM at the FNB branch in Reading, Pennsylvania, at the direction of co-schemer Steven Ronald Randall, co-schemer L.T., who was then a minor, deposited a fraudulent check in the amount of approximately \$2,500 into co-schemer Jair Peralta's FNB account ending in 9582 -- check number 244, drawn on the closed

Sovereign Bank account of A.K. ending in 5242, and made payable to Peralta.

27. On multiple occasions between on or about August 23, 2017, and on or about August 26, 2017, defendant JERRY LEE WOMACK, JR., co-schemers Nasir Joseph Outlaw and Steven Ronald Randall, and co-schemers working at their direction, including co-schemers Shyann Carrero, Xavanna Olivera, Ahsheem Nock, N.C. L.T., and B.B., used and aided and abetted the use of the ATM debit card and PIN number associated with the FNB account of co-schemer Jair Peralta ending in 9582 to collectively withdraw approximately \$7,667.65 from that account.

28. On or about August 24, 2017, at an ATM at the FNB branch in Cumru Township, Berks County, Pennsylvania, at the direction of co-schemer Steven Ronald Randall, co-schemer L.T., who was then a minor, deposited a fraudulent check in the amount of approximately \$2,700 into co-schemer Jair Peralta's FNB account ending in 9582 -- check number 249, drawn on the closed Sovereign Bank account of A.K. ending in 5242, and made payable to Peralta.

29. On or about August 25, 2017, at an ATM at the FNB branch in Cumru Township, Berks County, Pennsylvania, co-schemer Ahsheem Nock deposited a fraudulent check in the amount of approximately \$2,800 into co-schemer Jair Peralta's FNB account ending in 9582 -- check number 635 drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938 and made payable to Peralta.

30. On or about August 26, 2017, co-schemer Steven Ronald Randall attempted without success on two separate occasions to use the ATM debit card tied to the FNB account of co-schemer Jair Peralta ending in 9582 to send money through Randall's JPay account to the JPay account of an inmate of the Pennsylvania Department of Corrections.

**FNB ACCOUNT OF XAVANNA OLIVERA**

**(Intended Loss of \$4,399; Actual Loss of \$3,866.94)**

31. On or before August 10, 2017, at the request of co-schemers Nasir Joseph Outlaw and Shyann Carrero, co-schemer Xavanna Olivera agreed to open an FNB account and obtain an ATM debit card associated with the account in order to deposit fraudulent checks and withdraw cash before FNB discovered that the checks were fraudulent in return for the promise of a portion of the proceeds successfully obtained from FNB.

32. On or about August 10, 2017, at an FNB branch in Cumru Township, Berks County, Pennsylvania, co-schemer Xavanna Olivera opened an FNB account ending in 9988 with a \$15 cash deposit and obtained an ATM debit card associated with the account.

33. On or about August 23, 2017, at an ATM at the FNB branch in Muhlenberg Township, Berks County, Pennsylvania, at the direction of co-schemer Steven Ronald Randall, co-schemer L.T., who was then a minor, deposited a fraudulent check in the amount of approximately \$1,999 into co-schemer Xavanna Olivera's FNB account ending in 9988 -- check number 247, drawn on the closed Sovereign Bank account of A.K. ending in 5242, and made payable to Olivera.

34. On or about August 24, 2017, at the FNB branch in Cumru Township, Berks County, Pennsylvania, at the direction of co-schemer Steven Ronald Randall, co-schemer L.T., who was then a minor, deposited a fraudulent check in the amount of approximately \$1,900 into co-schemer Xavanna Olivera's FNB account ending in 9988 -- check number 251, drawn on the closed Sovereign Bank account of A.K. ending in 5242, and made payable to Olivera.

35. On multiple occasions between on or about August 23, 2017 and on or about August 25, 2017, defendant JERRY LEE WOMACK, JR., co-schemers Nasir Joseph



Outlaw and Steven Ronald Randall, and co-schemers working at their direction, including co-schemers Xavanna Olivera, Shyann Carrero, L.T., and B.B., used and aided and abetted the use of the ATM debit card and PIN number associated with Olivera's FNB account ending in 9988 to collectively withdraw approximately \$3,066.94.

36. On or about August 25, 2017, at an FNB branch in Cumru Township, Berks County, Pennsylvania, co-schemer Shyann Carrero drove co-schemer Xavanna Olivera through the drive-through teller line while Olivera withdrew approximately \$800 cash from her FNB account ending in 9988.

37. On or about August 25, 2017, co-schemer Steven Ronald Randall caused the mobile deposit of a fraudulent check in the amount of approximately \$500 into co-schemer Xavanna Olivera's FNB account ending in 9988 -- check number 253, drawn on the closed Sovereign Bank account of A.K. ending in 5242, and made payable to Olivera.

**FNB ACCOUNT OF R.C.**

**(Intended Loss of \$7,998; Actual Loss of \$7,990.19)**

38. On or about August 22, 2017, at an FNB branch in Cumru Township, Berks County, Pennsylvania, co-schemer R.C. opened an FNB account ending in 0036 with a \$30 cash deposit and obtained an ATM debit card associated with the account.

39. On or about August 23, 2017, at the FNB branch in Muhlenberg Township, Berks County, Pennsylvania, at the direction of co-schemer Steven Ronald Randall, co-schemer L.T., who was then a minor, deposited a fraudulent check in the amount of approximately \$2,498 into R.C.'s FNB account ending in 0036 -- check number 245, drawn on the closed Sovereign Bank account of A.K. ending in 5242, and made payable to R.C.

40. On or about August 24, 2017, at the FNB branch in Cumru Township,

Berks County, Pennsylvania, at the direction of co-schemer Steven Ronald Randall, co-schemer L.T., who was then a minor, deposited a fraudulent check in the amount of approximately \$2,700 into R.C.'s FNB account ending in 0036 -- check number 250, drawn on the closed Sovereign Bank account of A.K. ending in 5242, and made payable to R.C.

41. On multiple occasions between on or about August 24, 2017, and on or about August 28, 2017, defendant JERRY LEE WOMACK, JR., co-schemers Nasir Joseph Outlaw and Steven Ronald Randall, and co-schemers working at their direction, including co-schemers Shyann Carrero, Xavanna Olivera, L.T., N.C., and B.B., used and aided and abetted the use of the ATM debit card and PIN number associated with the FNB account of R.C. ending in 0036 to collectively withdraw approximately \$7,976.19.

42. On or about August 25, 2017, at the FNB branch in Muhlenberg Township, Berks County, Pennsylvania, at the direction of co-schemer Steven Ronald Randall, co-schemer Ahsheem Nock deposited a fraudulent check in the amount of approximately \$2,800 into R.C.'s FNB account ending in 0036 -- check number 100, drawn on the closed Wells Fargo Bank account of M.H. ending in 7438, and made payable to R.C.

43. On or about August 26, 2017, co-schemer Steven Ronald Randall utilized the ATM debit card associated with R.C.'s FNB account ending in 0036 to attempt to transfer approximately \$30 through Randall's JPay account ending in 6044 to an inmate at the Rockview State Correctional Institution in Bellefonte, Pennsylvania.

44. On or about August 26, 2017, co-schemer Steven Ronald Randall utilized the ATM debit card associated with R.C.'s FNB account ending in 0036 to transfer approximately \$30 through Randall's JPay account ending in 6044 to an inmate at the Rockview State Correctional Institution in Bellefonte, Pennsylvania.

45. On or about August 26, 2017, co-schemer Steven Ronald Randall utilized the ATM debit card associated with R.C.'s FNB account ending in 0036 to transfer approximately \$30 through Randall's JPay account ending in 6044 to an inmate at the Coal Township State Correctional Institution in Coal Township, Pennsylvania.

**FNB ACCOUNT OF JAYLEN JEFFERSON**

**(Intended Loss of \$2,800; Actual Loss of \$2,319)**

46. On or about August 22, 2017, at an FNB branch in Exeter Township, Berks County, Pennsylvania, at the request of defendant JERRY LEE WOMACK, JR. and co-schemer Daquan Nock, co-schemer Jaylen Jefferson opened an FNB account ending in 3964 with a \$10 cash deposit and subsequently obtained an ATM debit card associated with the account.

47. On or about August 31, 2017, at an ATM at the FNB branch in Exeter Township, Berks County, Pennsylvania, co-schemer Daquan Nock deposited a fraudulent check in the amount of approximately \$2,800 into co-schemer Jaylen Jefferson's FNB account ending in 3964 -- check number 494, drawn on the closed Citizens Bank account of V.K. and G.K. ending in 0478, and made payable to Jefferson.

48. On multiple occasions on or about September 1, 2017, defendant JERRY LEE WOMACK, JR., co-schemers Daquan Nock and Jaylen Jefferson, and other co-schemers, used and aided and abetted the use of the ATM debit card and PIN number associated with the FNB account of co-schemer Jaylen Jefferson ending in 3964 to withdraw collectively approximately \$2,319 from that account.

**FNB ACCOUNT OF AHSHEEM NOCK**

**(Intended Loss of \$5,600; Actual Loss of \$5,598.37)**

49. On or before August 24, 2017, at the request of defendant JERRY LEE WOMACK, JR., co-schemer Ahsheem Nock agreed to open an FNB account and obtain an ATM debit card associated with the account in order to deposit fraudulent checks and withdraw cash before FNB discovered that the checks were fraudulent in return for the promise of a portion of the proceeds successfully obtained from FNB.

50. On or about August 24, 2017, at an FNB branch in Cumru Township, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Ahsheem Nock opened an FNB account ending in 9509 with a \$50 cash deposit and obtained an ATM debit card associated with the account.

51. On or about August 24, 2017, at an ATM at the FNB branch in Cumru Township, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Ahsheem Nock deposited a fraudulent check in the amount of approximately \$2,800 into his FNB account ending in 9509 -- check number 252, drawn on the closed Sovereign Bank account of A.K. ending in 5242 and made payable to Ahsheem Nock.

52. On or about August 25, 2017, at an FNB branch in Cumru Township, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Ahsheem Nock withdrew approximately \$640 cash from his FNB account ending in 9509.

53. On or about August 25, 2017, at an ATM at the FNB branch in Cumru Township, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Ahsheem Nock deposited a fraudulent check in the amount of approximately \$2,800 into his

FNB account ending in 9509 -- check number 624, drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938 and made payable to Ahsheem Nock.

54. On multiple occasions between on or about August 25, 2017, and on or about August 26, 2017, defendant JERRY LEE WOMACK, JR., co-schemers Nasir Joseph Outlaw and Steven Ronald Randall, and other co-schemers working at their direction, including co-schemers Ahsheem Nock and B.B., used and aided and abetted the use of the ATM debit card and PIN number associated with co-schemer Ahsheem Nock's FNB account ending in 9509 to collectively withdraw approximately \$4,982.87 from that account.

55. On or about August 26, 2017, co-schemer Steven Ronald Randall utilized the ATM debit card associated with co-schemer Ahsheem Nock's FNB account ending in 9509 to transfer approximately \$27 through Randall's JPay account ending in 6044 to an inmate at the Frackville State Correctional Institution in Frackville, Pennsylvania.

**FNB ACCOUNT OF ZACHERY THOMAS**

**(Intended Loss of \$10,400; Actual Loss of \$5,598.44)**

56. On or before September 6, 2017, at the request of defendant JERRY LEE WOMACK, JR. and co-schemer Daquan Nock, co-schemer Zachery Thomas agreed to open an FNB account and obtain an ATM debit card associated with the account for the purpose of depositing fraudulent checks and withdrawing cash from the account before FNB discovered that the checks were fraudulent, in return for the promise of a portion of the proceeds successfully obtained from FNB.

57. On or about September 6, 2017, co-schemer Daquan Nock drove defendant JERRY LEE WOMACK, JR. and co-schemer Zachery Thomas to the FNB branch in Exeter Township, Berks County, Pennsylvania.

58. On or about September 6, 2017, at an FNB branch in Exeter Township, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Zachery Thomas opened an FNB account ending in 3840 with a \$60 cash deposit that was provided to him by defendant WOMACK, and subsequently obtained via U.S. mail an ATM debit card associated with the account.

59. On or about September 20, 2017, at an ATM at the FNB branch in Muhlenberg Township, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Zachery Thomas deposited a fraudulent check in the amount of approximately \$2,800 into his FNB account ending in 3840 -- check number 531, drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938, and made payable to Zachery Thomas.

60. On or about September 21, 2017, at an ATM at the FNB branch in Wyomissing Borough, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Zachery Thomas deposited a fraudulent check in the amount of approximately \$2,800 into his FNB account ending in 3840 -- check number 532, drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938, and made payable to Zachery Thomas.

61. On or about September 23, 2017, at an ATM at the FNB branch in Wyomissing Borough, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Zachery Thomas deposited a fraudulent check in the amount of approximately \$2,800 into his FNB account ending in 3840 -- check number 534, drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938, and made payable to Zachery Thomas.

62. On or about September 23, 2017, at an ATM at the FNB branch in Wyomissing Borough, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Zachery Thomas deposited a fraudulent check in the amount of approximately \$2,000 into his FNB account ending in 3840 -- check number 536, drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938, and made payable to Zachery Thomas.

63. On multiple occasions between on or about September 21, 2017, and on or about September 25, 2017, defendant JERRY LEE WOMACK and co-schemers working at his direction, including co-schemers Daquan Nock and Zachery Thomas, used and aided and abetted the use of the ATM debit card and PIN number associated with the FNB account of Zachery Thomas ending in 6938 to collectively withdraw approximately \$6,066.61 from that account.

**FNB ACCOUNT OF LINDA PACHECO**

**(Intended Loss of \$8,300; Actual Loss of \$5,912.26)**

64. On or before September 11, 2017, at the request of co-schemer Shyann Carrero, co-schemer Linda Pacheco agreed to open an FNB account and obtain an ATM debit card associated with the account in order to deposit fraudulent checks and withdraw cash before FNB discovered that the checks were fraudulent in return for the promise of a portion of the proceeds successfully obtained from FNB.

65. On or about September 11, 2017, at an FNB branch in Exeter Township, Berks County, Pennsylvania, co-schemer Linda Pacheco opened an FNB account ending in 4293 with a \$25 cash deposit, and subsequently obtained an ATM debit card associated with the account.

66. On or about September 21, 2017, at an ATM at the FNB branch in

Wyomissing Borough, Berks County, Pennsylvania, co-schemer Zachery Thomas deposited a fraudulent check in the amount of approximately \$2,800 into co-schemer Linda Pacheco's FNB account ending in 4293 -- check number 533, drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938, and made payable to Pacheco.

67. On multiple occasions between on or about September 22, 2017, and on or about September 26, 2017, co-schemers Nasir Joseph Outlaw and Zachery Thomas, and other co-schemers, used and aided and abetted the use of the ATM debit card and PIN number associated with the FNB account of co-schemer Linda Pacheco ending in 4293 to collectively withdraw approximately \$5,913.01 from that account.

68. On or about September 22, 2017, at an ATM at the FNB branch in Wyomissing Borough, Berks County, Pennsylvania, co-schemer Zachery Thomas deposited a fraudulent check in the amount of approximately \$2,800 into co-schemer Linda Pacheco's FNB account ending in 4293 -- check number 535, drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938, and made payable to Pacheco.

69. On or about September 25, 2017, at an ATM at the FNB branch in Wyomissing Borough, Berks County, Pennsylvania, a co-schemer deposited a fraudulent check in the amount of approximately \$2,700 into co-schemer Linda Pacheco's FNB account ending in 4293 -- check number 540, drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938, and made payable to Pacheco.

**FNB ACCOUNT OF GEORGE ANTHONY MARTINEZ**

**(Intended Loss of \$2,800; Actual Loss of \$2,791.17)**

70. On or before September 13, 2017, co-schemer George Anthony Martinez agreed to allow his existing FNB account ending in 5811 to be used to deposit fraudulent checks



and to withdraw cash before FNB discovered that the checks were fraudulent, in return for the promise of a portion of the proceeds successfully obtained from FNB.

71. On or about September 13, 2017, at an ATM at an FNB branch in Exeter Township, Berks County, Pennsylvania, co-schemer Daquan Nock deposited a fraudulent check in the amount of approximately \$2,800 into co-schemer George Anthony Martinez's FNB account ending in 5811 -- check number 527, drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938, and made payable to Martinez.

72. On multiple occasions between on or about September 13, 2017, and on or about September 18, 2017, co-schemers working at the direction of defendant JERRY LEE WOMACK, JR. and co-schemer Steven Ronald Randall, including co-schemers Daquan Nock, Zachery Thomas, and George Anthony Martinez, used and aided and abetted the use of the ATM debit card and PIN number associated with the FNB account of Martinez ending in 5811 to collectively withdraw approximately \$2,808.17 from that account.

**FNB ACCOUNT OF ELIJAH MARELL WILLIAMS**

**(Intended Loss of \$5,600; Actual Loss of \$0)**

73. On or before October 2, 2017, defendant JERRY LEE WOMACK, JR. recruited co-schemer Elijah Marell Williams via social media posts to participate in a scheme to defraud FNB by depositing invalid checks into FNB accounts and withdrawing the cash before FNB discovered that the checks were fraudulent.

74. On or before October 2, 2017, at the request of defendant JERRY LEE WOMACK, JR., co-schemer Elijah Marell Williams agreed to open an FNB account and obtain an ATM debit card associated with the account in order to deposit fraudulent checks and withdraw cash before FNB discovered that the checks were fraudulent in return for the promise

of a portion of the proceeds successfully obtained from FNB.

75. On or about October 2, 2017, at an FNB branch in Wyomissing Borough, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, co-schemer Elijah Marell Williams opened a new FNB account ending in 6867 with a cash deposit of approximately \$25 that was provided by defendant WOMACK.

76. On or about October 11, 2017, at an ATM at the FNB branch in Wyomissing Borough, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR. co-schemer Elijah Marell Williams attempted without success to deposit a fraudulent check in the amount of approximately \$2,800 into his FNB account ending in 6867.

77. On or about October 11, 2017, at an ATM at the FNB branch in Muhlenberg Township, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Elijah Marell Williams deposited into his FNB account ending in 6867 a fraudulent check in the amount of approximately \$2,800 – check number 544 drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938 and made payable to Williams.

78. On multiple occasions on or about October 12, 2017, at various merchants in Berks County, Pennsylvania, defendant JERRY LEE WOMACK, JR. and co-schemer Elijah Marell Williams used and aided and abetted the use of Williams' ATM debit card and PIN number associated with defendant Williams' FNB account ending in 6867 to attempt without success to withdraw a total of approximately \$2,593.25 from that account.

79. On or about October 12, 2017, at an ATM at the FNB branch in Muhlenberg Township, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Elijah Marell Williams attempted without success to deposit into

his FNB account ending in 6867 a fraudulent check in the amount of approximately \$2,800.

**FNB ACCOUNT OF ANABELL DEALBA**

**(Intended Loss of \$2,800; Actual Loss of \$1,923.85)**

80. On or before October 12, 2017, at the direction of defendant JERRY LEE WOMACK, JR., co-schemers Zachary Thomas and Jarrod Thomas recruited co-schemer Anabell Dealba to allow her existing FNB account ending in 7912 to be used to deposit fraudulent checks into her FNB account and to withdraw the cash before FNB discovered that the checks were fraudulent.

81. On or about October 12, 2017, at an FNB branch in Muhlenberg Township, Berks County, Pennsylvania, co-schemer Anabell Dealba obtained a new ATM debit card tied to her FNB account ending in 7912.

82. On or about October 13, 2017, defendant JERRY LEE WOMACK, JR., gave co-schemer Jarrod Thomas a fraudulent check in the amount of approximately \$2,800 -- check number 547, drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938, and made payable to co-schemer Anabell Dealba.

83. On or about October 13, 2017, co-schemer Anabell Dealba gave the ATM debit card and PIN tied to her FNB account ending in 7912 to co-schemer Jarrod Thomas.

84. On or about October 13, 2017, at the drive-thru ATM at an FNB branch in Cumru Township, Berks County, Pennsylvania, while co-schemer Anabell Dealba sat next to him in a car, co-schemer Jarrod Thomas used the ATM debit card and PIN associated with Dealba's FNB account ending in 7912 to deposit a fraudulent check in the amount of approximately \$2,800 into Dealba's FNB account ending in 7912 -- check number 547, drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938, and made payable to

Dealba. At the time of this deposit, Dealba's FNB account had a balance of approximately \$0.64.

85. On or about October 14, 2017, at an ATM at an FNB branch in Reading, Pennsylvania, co-schemers Anabell Dealba and Jarrod Thomas conducted a balance inquiry into Dealba's FNB account ending in 7912 to determine whether the check deposited into the account by Jarrod Thomas the previous day had cleared.

86. On or about October 14, 2017, co-schemer Anabell Dealba gave her ATM debit card and PIN associated with her FNB account ending in 7912 to defendant JERRY LEE WOMACK, JR. and co-schemer Ahsheem Nock, in order for them to use it to withdraw cash from her account before FNB discovered that the approximately \$2,800 check that had been deposited into her FNB account the previous day was fraudulent.

87. On or about October 14, 2017, at an ATM at the FNB branch in Reading, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., co-schemer Ahsheem Nock used co-schemer Anabell Dealba's ATM debit card and PIN to withdraw approximately \$500 cash from Dealba's FNB account ending in 7912.

88. On multiple occasions on or about October 14, 2017, at various ATMs and merchants, including Giant Supermarket and Walmart in Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, co-schemers Anabell Dealba, Jarrod Thomas, and Ahsheem Nock used and aided and abetted the use of Dealba's ATM debit card and PIN number tied to her FNB account ending in 7912 to collectively withdraw an additional approximately \$1,421.99 from that account.

89. On or about October 14, 2017, defendant JERRY LEE WOMACK, JR. paid co-schemer Anabell Dealba approximately \$700 cash for her participation in the scheme.

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. At all times material to this information, Fulton Bank, NA (“Fulton Bank”) was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 7551.

2. From in or about June 2017, through in or about December 2017, in the Eastern District of Pennsylvania and elsewhere, defendant

**JERRY LEE WOMACK, JR.**

alone and with co-schemers known and unknown, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud Fulton Bank and to obtain monies owned by and under the care, custody, and control of Fulton Bank by means of false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

3. Paragraphs 7 through 17 of Count One are incorporated herein as though fully set forth.

**FULTON BANK ACCOUNT OF JAIR PERALTA**

**(Intended Loss of \$6,036; Actual Loss of \$4,014.87)**

4. On or before August 9, 2017, at the request of co-schemer Nasir Joseph Outlaw, co-schemer Jair Peralta agreed to open a Fulton Bank account and obtain an ATM debit card associated with the account in order to deposit fraudulent checks and withdraw cash before Fulton Bank discovered that the checks were fraudulent in return for the promise of a portion of the proceeds successfully obtained from Fulton Bank.

5. On or about August 9, 2017, at a Fulton Bank branch in Cumru Township,

Berks County, Pennsylvania, at the direction of co-schemer Nasir Joseph Outlaw, co-schemer Jair Peralta opened a Fulton Bank account ending in 8039 and obtained an ATM debit card associated with the account.

6. On or about August 15, 2017, co-schemer Steven Ronald Randall drove defendant JERRY LEE WOMACK, JR. and co-schemer Jair Peralta to a Fulton Bank branch in Shillington, Pennsylvania.

7. On or about August 15, 2017, at a Fulton Bank branch in Shillington, Pennsylvania, defendant JERRY LEE WOMACK, JR. and co-schemer Steven Ronald Randall gave co-schemer Jair Peralta a fraudulent check in the amount of approximately \$1,999 and instructed Peralta to deposit the check into his Fulton Bank account.

8. On or about August 15, 2017, at an ATM at the Fulton Bank branch in Shillington, Pennsylvania, co-schemer Jair Peralta deposited a fraudulent check in the amount of approximately \$1,999 into his Fulton Bank account ending in 8039 -- check number 639, drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938, and made payable to Peralta.

9. On or about August 16, 2017, co-schemer Steven Ronald Randall caused the mobile deposit of a fraudulent check in the amount of approximately \$1,000 into co-schemer Jair Peralta's Fulton Bank account ending in 8039 -- check number 220, drawn on the closed TD Bank account of A.B. ending in 0846, and made payable to Peralta.

10. On or about August 16, 2017, at an ATM at the Fulton Bank branch in Jenkintown, Pennsylvania, at the direction of co-schemer Steven Ronald Randall, co-schemer L.T., who was then a minor, deposited a fraudulent check in the amount of approximately \$1,537 into co-schemer Jair Peralta's Fulton Bank account ending in 8039 -- check number 146, drawn

on the closed Viriva Community Credit Union account of M.G.B. ending in 0092, and made payable to Peralta.

11. On or about August 17, 2017, co-schemer Steven Ronald Randall caused the mobile deposit of a fraudulent check in the amount of approximately \$1,000 into co-schemer Jair Peralta's Fulton Bank account ending in 8039 -- check number 145, drawn on the closed Viriva Community Credit Union account of M.G.B. ending in 0092, and made payable to Peralta.

12. On or about August 17, 2017, at the teller drive-through window at the Fulton Bank branch in Cumru Township, Berks County, Pennsylvania, co-schemer Jair Peralta withdrew approximately \$2,000 from his Fulton Bank account ending in 8039.

13. On or about August 17, 2017, co-schemer Steven Ronald Randall attempted without success to use the ATM debit card tied to the Fulton Bank account of co-schemer Jair Peralta ending in 8039 to send money through Randall's JPay account to the JPay account of an inmate of the Pennsylvania Department of Corrections.

14. On approximately seven separate occasions between on or about August 17, 2017, and on or about August 18, 2017, at the direction of co-schemer Nasir Joseph Outlaw, co-schemer Jair Peralta attempted without success to transfer a total of approximately \$9,900 from his Fulton Bank account ending in 8039 to co-schemer Outlaw through the use of the Square Cash application.

15. On or about August 18, 2017, co-schemer Steven Ronald Randall caused the mobile deposit of a fraudulent check in the amount of approximately \$500 into co-schemer Jair Peralta's Fulton Bank account ending in 8039 -- check number 242, drawn on the closed Sovereign Bank account of A.K. ending in 5242, and made payable to Peralta.

16. On or about August 18, 2017, at the teller drive-through window at the Fulton Bank branch in Cumru Township, Berks County, Pennsylvania, co-schemer Jair Peralta withdrew approximately \$1,400 from his Fulton Bank account ending in 8039.

17. On or about August 19, 2017, at the teller drive-through window at the Fulton Bank branch in Cumru Township, Berks County, Pennsylvania, co-schemer Jair Peralta withdrew approximately \$500 from his Fulton Bank account ending in 8039.

**FULTON BANK ACCOUNT OF P.S.**

**(Intended Loss of \$2,250; Actual Loss of \$1,984.54)**

18. On or before August 1, 2017, defendant JERRY LEE WOMACK, JR. recruited co-schemer Zaire Chesney via social media to participate in a scheme to defraud banks by depositing invalid checks into bank accounts and withdrawing the cash before the banks discovered that the checks were fraudulent.

19. On or before October 1, 2017, co-schemer Zaire Chesney recruited co-schemer P.S. to allow her existing Fulton Bank account ending in 1079 to be used to defraud Fulton Bank through the deposit of fraudulent checks and the withdrawal of cash before the bank discovered that the checks were fraudulent.

20. On or before October 1, 2017, co-schemer Zaire Chesney obtained co-schemer P.S.'s online banking profile and means of identification and provided that information to defendant JERRY LEE WOMACK, JR.

21. On or about October 1, 2017, defendant JERRY LEE WOMACK, JR. deposited a fraudulent check in the amount of approximately \$2,250 into co-schemer P.S.'s Fulton Bank account ending in 1079 via mobile deposit – check number 644 drawn on the closed Riverfront Federal Credit Union account of A.K. ending in 6938 and made payable to P.S. At the



time of this deposit, co-schemer P.S.'s Fulton Bank account ending in 1079 had a balance of approximately \$51.93.

22. On or about August 2, 2017, at an ATM at the Fulton Bank branch in Womelsdorf Borough, Berks County, Pennsylvania, P.S. withdrew approximately \$200 cash from her Fulton Bank account ending in 1079.

23. On or about August 2, 2017, co-schemer Zaire Chesney gave the ATM debit card and PIN tied to the Fulton Bank account of P.S. ending in 1079 to defendant JERRY LEE WOMACK, JR.

24. On multiple occasions between on or about August 2, 2017 and on or about August 4, 2017, defendant JERRY LEE WOMACK, JR. and co-schemers working at his direction used and aided and abetted the use of the ATM debit card and PIN number associated with the Fulton Bank account of P.S. ending in 1079 to collectively withdraw approximately \$536.47 from that account.

25. On or about August 3, 2017, at the teller window at Fulton Bank branch located in Womelsdorf Borough, Berks County, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR. and co-schemer Zaire Chesney, co-schemer P.S. withdrew approximately \$1,500 cash from her Fulton Bank account ending in 1079.

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT THREE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

1. At all times material to this information, Riverfront Federal Credit Union (“RFCU”) was a financial institution chartered by the National Credit Union Administration, charter number 5856, whose deposits were insured by the National Credit Union Share Insurance Fund.

2. From in or about June 2017, through in or about December 2017, in the Eastern District of Pennsylvania and elsewhere, defendant

**JERRY LEE WOMACK, JR.**

alone and with co-schemers known and unknown, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud RFCU and to obtain monies owned by and under the care, custody, and control of RFCU by means of false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

3. Paragraphs 7 through 17 of Count One are incorporated herein as though fully set forth.

**RFCU ACCOUNT OF B.H.**

**(Intended Loss of \$4,276; Actual Loss of \$3,124.94)**

4. On or before June 26, 2017, defendant JERRY LEE WOMACK, JR. recruited co-schemer B.H., who was then a minor, via social media to participate in a scheme to defraud banks by depositing invalid checks into bank accounts and withdrawing the cash before the banks discovered that the checks were fraudulent.

5. On or before June 26, 2017, at the request of defendant JERRY LEE

WOMACK, JR., co-schemer B.H., who was then a minor, agreed to allow his existing RFCU account ending in 6963 to be used to deposit fraudulent checks and to withdraw cash before RFCU discovered that the checks were fraudulent, in return for the promise of a portion of the proceeds successfully obtained from RFCU.

6. On or before June 26, 2017, in Reading, Pennsylvania, co-schemer B.H., who was then a minor, gave his ATM debit card and PIN associated with his RFCU account ending in 6963 to defendant JERRY LEE WOMACK, JR. in order to defraud RFCU.

7. On or about June 26, 2017, at an ATM at an RFCU branch in Reading, Pennsylvania, defendant JERRY LEE WOMACK, JR. deposited a fraudulent check in the amount of approximately \$2,326 into co-schemer B.H.'s RFCU account ending in 6963 -- check number 301, drawn on the closed Sovereign Bank account of A.K. ending in 5242, and made payable to co-schemer B.H. At the time of this deposit, co-schemer B.H.'s RFCU account ending in 6963 had a balance of approximately \$11.03.

8. On two separate occasions on or about June 26, 2017, at an ATM at an RFCU branch in Reading, Pennsylvania, at the direction of defendant JERRY LEE WOMACK, JR., a co-schemer attempted without success to withdraw \$300 cash, each time from the RFCU account of B.H. ending in 6963.

9. On or about June 26, 2017, at an ATM at an RFCU branch in Reading, Pennsylvania, defendant JERRY LEE WOMACK, JR. deposited a fraudulent check in the amount of approximately \$1,950 into co-schemer B.H.'s RFCU account ending in 6963 -- check number 302, drawn on the closed Sovereign Bank account of A.K. ending in 5242, and made payable to co-schemer B.H.

10. On or about June 26, 2017, at an ATM at an RFCU branch in Reading,

Pennsylvania, defendant JERRY LEE WOMACK, JR. attempted without success to withdraw \$300 cash from the RFCU account of B.H. ending in 6963.

11. On multiple occasions on or about June 26, 2017, defendant JERRY LEE WOMACK, JR. and other co-schemers working at his direction, used and aided and abetted the use of the ATM debit card and PIN number associated with the RFCU account of co-schemer B.H. ending in 6963 to collectively withdraw approximately \$3,124.94.

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about June 26, 2017, in the Eastern District of Pennsylvania, and elsewhere,  
defendant

**JERRY LEE WOMACK, JR.**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the Riverfront Federal Credit Union ATM debit card number and personal identification number of B.H., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

**COUNT FIVE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about August 24, 2017, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JERRY LEE WOMACK, JR.**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the First National Bank ATM debit card number and personal identification number of Jair Peralta, charged separately, during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

**NOTICE OF FORFEITURE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. As a result of the violation of Title 18, United States Code, Section 1344 set forth in this information, defendant

**JERRY LEE WOMACK, JR.**

shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including but not limited to \$12,000 in United States currency.

2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 982(a)(2)(A).

*for*   
WILLIAM M. McSWAIN  
UNITED STATES ATTORNEY